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10 Chapter 9 Counsel for Tulare Local Healthcare District, Debtor

11 IN THE UNITED STATES BANKRUPTCY COURT

12 EASTERN DISTRICT OF CALIFORNIA

13 FRESNO DIVISION

14 In re

15 TULARE LOCAL HEALTHCARE
16 DISTRICT, dba TULARE REGIONAL
17 MEDICAL CENTER,

18 Debtor.

19 Tax ID #: 94-6002897

20 Address: 869 N. Cherry Street
21 Tulare, CA 93274

22 CASE NO. 17-13797

23 Chapter 9

24 DC No.: WW-87

25 Date: April 25, 2019

26 Time: 9:30 a.m.

27 Place: 2500 Tulare Street

28 Fresno, CA 93721

 Courtroom 13

 Judge: Honorable René Lastreto II

19 DEBTOR'S OBJECTION TO PROOF OF CLAIM NUMBER 137
20 FILED BY BB&T INSURANCE SERVICES, INC.

21 TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE AND OTHER

22 PARTIES IN INTEREST:

23 Pursuant to 11 U.S.C. § 502 and FRBP 3007, Tulare Local Healthcare District
24 dba Tulare Regional Medical Center (the "Debtor") objects to Proof of Claim Number
25 137 (the "Claim") filed by BB&T Insurance Services, Inc. ("BB&T"). This objection is
26 based on the following:

27 1. Prior to filing bankruptcy, the Debtor was under the management and
28 control of Healthcare Conglomerate Associates, LLC ("HCCA"). Among HCCA's

1 responsibilities was to see to the administration of insurance benefits for employees.

2 The Debtor had no employees of its own.

3 2. The Debtor commenced a voluntary bankruptcy petition under Chapter 9
4 of the Bankruptcy Code on September 30, 2017 (the "Petition Date"), in the Eastern
5 District of California and obtained an order rejecting the contract with HCCA on
6 November 1, 2017.

7 | 3. The claims bar date was set as April 10, 2018.

8 4. On February 28, 2018, BB&T filed Proof of Claim 137 in the total amount
9 of \$41,666.64. This Proof of Claim was for insurance consulting fees rendered to
10 HCCA from June 1, 2017 through September 1, 2017. A copy of Proof of Claim
11 Number 137 is attached as Exhibit "A".

12 5. The Debtor objects to BB&T's claim on the basis that during the period
13 for which the claim is asserted it was HCCA and not the Debtor who was responsible
14 for these insurance consulting fees and the Debtor has no responsibility for this claim.

15 WHEREFORE, the Debtor respectfully requests that this Objection be sustained
16 and the Proof of Claim Number 137 filed by Claimant be disallowed in its entirety and
17 seeks such other and further relief as is just and proper.

Dated: 3/2, 2019

**WALTER WILHELM LAW GROUP,
a Professional Corporation**

Bv:

Riley C. Walter, Attorneys for Debtor,
Tulare Local Healthcare District dba Tulare
Regional Medical Center